

FILED
CLERK'S OFFICE
OCT 25 PM 1:51
DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Civil Action: No. 1-24-cv-10451-MJJ

LOTFOLAH KAVEH AFRASIABI,)
)
Plaintiff,)
)
v.)
)
THE GOVERNMENT OF ISLAMIC)
)
REPUBLIC OF IRAN, ET. AL.)
)
Defendants.)

USMS
Screened

**PLAINTIFF'S COMPLAINT TO THE COURT REGARDING THE UNPROFSSIONAL CONDUCT OF
DEFENDANT'S ATTORNEY, SAEID AMINI**

Plaintiff Afrasiabi writes this letter to complain regarding the unethical, deceitful, and unprofessional conduct of Defendants' attorney, Saeid Amini. After the conclusion of the hearing on October 24, 2024, attorney Amini approached the plaintiff's attorney, William Keefe, vilifying the plaintiff and warning him "watch out, be careful with this guy," according to Mr. Keefe's communication to the plaintiff right outside the court.

Plaintiff states that the above-mentioned conduct by attorney Amini is both unprofessional and contrary to the bar's code of conduct, which forbids an attorney's personal attack and even defamation against the opposing party, deserving a court reprimand. Clearly, attorney Amini's intention was to drive a wedge between the plaintiff and his attorney and, ultimately, to dispossess the plaintiff of apt representation by attorney Keefe.


Unfortunately, attorney Amini's unethical conduct complained of above is consistent with a systematic pattern of making false factual statements both in his pleadings as well as at the hearing on October 24th. Examples include, but not limited, to the following:

1. Attorney Amini claimed in court that the plaintiff's complaint states that the Iran Mission had made direct deposit in plaintiff's bank account. This is false and the complaint does not make any such statement.

2. Attorney Amini in the Motion to dismiss claims that the complaint alleges that the plaintiff accompanied defendant Zarif to San Francisco State University. Again, that is false and the complaint does not make such a statement.
3. Attorney Amini falsely claimed that the complaint alleges that “all the alleged action” of plaintiff’s consulting role took place in New York, contrary to the repeated statements that the bulk of plaintiff’s job performance transpired in Massachusetts.
4. Attorney Amini falsely denied that the Plaintiff had received (monthly) checks by the Mission sent to him in Massachusetts.
5. Attorney Amini falsified the plaintiff’s complaint by making it look like the plaintiff’s complaint did not say that the defendant Zarif and others at Iran Mission had repeatedly assured him that his role was “legal” and there was no legal problem with the job they offered Afrasiabi.¹
6. Attorney Amini falsely claimed at the October 24th hearing that the process of service for the Government of Islamic Republic of Iran had been left with someone at the front desk of the Iran Mission. Yet, the service was made properly per constable’s affidavit through special arrangement with a representative of Iran Mission, which is a political subdivision of the Iranian government with no independent existence apart from the government. This was identical service with the other defendants, which attorney Amini accepted without questioning the sufficiency of service. His lack of representation of Iranian government notwithstanding, his claim at the October 24th that he was questioning the sufficiency of service on the government as an ethical “officer of the court” is belied by the fact that in the same breath Amini misrepresented the nature of service on the defendant, Iranian government.

Notwithstanding the above-said, attorney Amini clearly has a problem with being truthful and his pernicious attempt to vilify the plaintiff with his attorney above-mentioned is on par with a pattern of maliciousness complained of herein.

Respectfully,



Kaveh L. Afrasiabi, Ph.D.

¹ Plaintiff Afrasiabi has proffered the letter of MIT linguist Noam Chomsky on his efforts for the release of US hostages, his months’ long cooperation with the family of FBI agent missing in Iran, and has also self-published a compendium of his articles, Agent of Peace, which include dozens of articles critical of Iranian government’s repression of women, restricted elections, and rights abuses. <https://www.amazon.com/Agent-Peace-Response-US-Complaint-ebook/dp/B08Y84SNLV>. Afrasiabi actively supported the Obama administration’s nuclear negotiations with Iran in numerous books and articles.

Cc: attorney William; attorney Rose; attorney Amini.